

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN THE MATTER OF:

CASE NO. 23-40141-BTR

**RAYMAK ENTERPRISES, LLC
104 Kiowa Drive W.
Gainesville, TX 76240
Tax ID/EIN: 82-4963370**

DEBTOR

CHAPTER 7

**THE COUNTY OF DENTON, TEXAS' LIMITED OBJECTION TO WESTLAKE FLOORING
COMPANY, LLC'S UNOPPOSED MOTION FOR RELIEF FROM AUTOMATIC STAY
REGARDING VEHICLES, AND WAIVER OF 30-DAY HEARING REQUIREMENT**
[Responding to Doc#23]

TO THE HONORABLE BRENDA T. RHOADES:

NOW COMES The County of Denton, Texas and files this Limited Objection to Westlake Flooring Company, LLC's *Motion at Docket 23* and respectfully shows the Court the following:

1. The County of Denton, Texas has valid *ad valorem* tax liens against all business personal property of the debtor for the 2022-2023 tax years. Said liens attached to the trucks which are the subject of the Motion pursuant to Texas Tax Code Section 32.01 on January 1st of each year and have priority over other property interests and liens pursuant to Texas Tax Code Section 32.05.

2. The County of Denton, Texas does not oppose termination of the automatic stay as requested by Movant so long as the form of order provides that the automatic stay also be terminated as to The County of Denton, Texas. The County of Denton, Texas further requests that it be provided written notice by Movant upon its repossession of the trucks. All valid outstanding *ad valorem* taxes, or such amount as agreed to by the parties, should be satisfied from the liquidation proceeds.

WHEREFORE, The County of Denton, Texas prays that the Court grant Westlake Flooring Company, LLC's motion with the inclusion of the provisions requested by The County of Denton herein.

Dated: August 18, 2023

Respectfully submitted,

MCCREARY, VESELKA, BRAGG & ALLEN, P.C.
P. O. Box 1269
Round Rock, TX 78680-1269
Direct phone: (512) 323-3241
Facsimile: (512) 323-3205
jparsons@mvmblaw.com

/s/ Julie Anne Parsons
Julie Anne Parsons
State Bar No. 00790358
ATTORNEYS FOR THE COUNTY OF DENTON,
TEXAS

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, I have served a copy of the above Limited Objection to the following parties in the manners stated below:

Attorney for Westlake Flooring Company, LLC

- Electronic

James R. Liebler, II
Liebler, Gonzalez & Portuondo
Courthouse Tower – 25th Floor
44 West Flagler Street
Miami, FL 33130
JRLII@lgplaw.com

Attorney for Debtor – Electronic:

Joyce Lindauer, Attorney
1412 Main Street, Suite 500
Dallas, Texas 75202
joyce@joycelindauer.com

Debtor – First Class U. S. Mail:

Raymak Enterprises, LLC
104 Kiowa Drive W.
Gainesville, TX 76240

U. S. Trustee – Electronic:

Office of the U. S. Trustee
110 N. College Avenue, Ste. 300
Tyler, TX 75702
USTPregion06.ty.ecf@usdoj.gov

Chapter 7 Trustee – Electronic:

Mark A. Weisbart
Chapter 7 Bankruptcy Trustee
10501 N Central Expy. Suite 106
Dallas, TX 75231-2203
mweisbart@haywardfirm.com

Parties in Interest – Electronic:

Larry Chek
Palmer Lehman Sandberg, PLLC
8350 N. Central Expressway, Suite 1111
Dallas, Texas 75206
lchek@pamlaw.com

Christopher V. Arisco
Padfield & Stout, LLP
420 Throckmorton Street, Suite 1210
Fort Worth, Texas 76102
carisco@padfieldstout.com

American Express National Bank
c/o Zwicker & Associates, P.C.
80 Minuteman Road
P.O. Box 9043
Andover, MA 01810-1041
bknotices@zwickerpc.com

Brian J. Wagner
Kutak Rock, LLP
5 Park Plaza, Suite 1500
Irvine, CA 92614-8595
Brian.wagner@kutakrock.com

Jeremy S. Williams
Adolyn C. Wyatt
Kutak Rock, LLP
901 East Byrd Street, Suite 1000
Richmond, Virginia 23219-4071
Jeremy.williams@kutakrock.com
Adolyn.wyatt@kutakrock.com

Electronically served parties were served through the Court's CM/ECF system.

/s/ Julie Anne Parsons
Julie Anne Parsons